

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-1139 (JKF)
)	Jointly Administered
)	
Debtors.)	Re: Docket No. 18328
)	6/2/08 Agenda Item 13

**CERTIFICATION OF COUNSEL REGARDING ORDER (A) ESTABLISHING
OCTOBER 31, 2008 AS THE PROOF OF CLAIM BAR DATE FOR ZONOLITE ATTIC
INSULATION CLAIMS AND (B) APPROVING THE RELATED PROOF OF CLAIM
FORM, BAR DATE NOTICES, AND NOTICE PROGRAM**

1. On March 18, 2008, the Debtors filed a Motion for an Order (A) Establishing a Proof of Claim Bar Date for Zonolite Attic Insulation Claims, and (B) Approving the Related Proof of Claim Form, Bar Date Notices, and Notice Program (“Bar Date Motion”) [Dkt. No. 18328]. The Debtors received various objections to the Bar Date Motion from Her Majesty the Queen of Canada (the “Crown”), certain Canadian ZAI Claimants, and the Official Committee for Asbestos Property Damage Claimants (the “PD Committee”).¹ A hearing was held on April 22, 2008, at which time the Court deferred ruling on the Bar Date Motion and instructed the parties to attempt to mediate the ZAI issues. The mediation took place and was unsuccessful.

2. A hearing on the Bar Date motion was held on June 2, 2008. The Court indicated that it would set a ZAI bar date for October 31, 2008, provided that all publication

¹ See Dkt. Nos. 18485, 18595, and 18497 respectively.

notice could be completed by mid-September 2008. The Court also instructed the parties to confer and attempt to agree to a form of order and the form of the underlying ZAI bar date documents.

3. The Debtors have conferred with their notice expert, and have determined that all publication notices, including television, will be completed prior to mid-September. A revised schedule of publication is included with the publication notice program at Exhibit C to the proposed order attached hereto (the "Order").

4. In addition, the Debtors have conferred with counsel for (A) the PD Committee; (B) the Canadian ZAI Claimants; (C) the Crown; (D) the PI Committee; (E) the FCR; and (F) Messrs. Scott and Westbrook on behalf of the ZAI Claimants on the form of Order and the underlying bar date documents. The attached Order and exhibits thereto incorporate the changes requested by various parties, and there are no objections to the form of Order and the accompanying exhibits.

5. As a result, the Debtors request entry of the attached Order and entry of the "Notice of Last Day to File a Claim Concerning Zonolite Attic Insulation ("ZAI")," which is annexed at Exhibit B to the Order.

Dated: June 13, 2008

Respectfully submitted,

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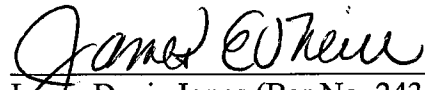
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